

JAP:DG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

PRE-ARRAIGNMENT
COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

EVANIO PERREVOORT,

Defendant.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

DANIEL DONAHUE, being duly sworn, deposes and states that he is a
Special Agent with the Department of Homeland Security, Homeland Security
Investigations, duly appointed according to law and acting as such.

On or about December 24, 2016, within the Eastern District of New York and
elsewhere, the defendant EVANIO PERREVOORT did knowingly, intentionally and
unlawfully import into the United States from a place outside thereof, cocaine, a Schedule II
controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and the grounds for his belief are
as follows:¹

1. On or about December 24, 2016, the defendant EVANIO
PERREVOORT arrived at John F. Kennedy International Airport ("JFK") in Queens, New

¹ Because the purpose of this Complaint is to set forth only those facts necessary to
establish probable cause to arrest, I have not described all the relevant facts and
circumstances of which I am aware.

York aboard Caribbean Airlines Flight 524 from Port of Spain, Republic of Trinidad and Tobago.


2. Upon his arrival, the defendant EVANIO PERREVOORT was selected for an enforcement examination by Customs and Border Protection (“CBP”) officers. The defendant presented one checked bag and one carry-on bag for inspection, the results of which were negative. During the examination, the defendant appeared visibly nervous and provided inconsistent statements. A pat-down search was requested and approved, which also yielded negative results. The defendant continued to exhibit nervous behavior and ultimately stated that he had swallowed ten pellets of narcotics.

3. The defendant EVANIO PERREVOORT was then presented with an x-ray consent form, which he read, indicated that he understood, and signed. The defendant was then transported to the medical facility at JFK.

4. An x-ray was then taken of the defendant’s intestinal tract, which was positive for foreign bodies. The defendant subsequently passed one pellet, which was probed and field-tested positive for the presence of cocaine. The defendant was placed under arrest. As of the date of this complaint, the defendant has passed at least 44 pellets.

5. The defendant EVANIO PERREVOORT will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that the defendant EVANIO PERREVOORT be dealt with according to law.


DANIEL DONAHUE
Special Agent
Homeland Security Investigations

Sworn to me before this
25th day of December, 2016


THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK